

CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D.C. 20505

27 April 1979

Ms. Joyce Walker
Deputy Associate Director
Office of Management and Budget
Washington, D.C. 20503

Dear Ms. Walker:

This Agency appreciates the opportunity to respond to the OMB memorandum of 6 April 1979, requesting our comments on the draft OMB circular on employee parking fees in the general sense and in particular, as this circular will affect the Agency. As you are aware, we have for years participated in an active program organizing and operating carpools by offering premium parking to participating employees. We clearly recognize the value of the program and will continue vigorous support.

The intent of the circular is clearly directed to energy conservation and is not established as a revenue source. As such, this Agency takes exception to parking fees when no viable alternative to privately owned vehicles exists. This Agency has the majority of its employees assigned to facilities in the outlying areas where there is no adequate public transportation. In addition, dispersed living areas and requirements for extended work days, particularly during periods of crisis, and shift work make it impossible for a significant number of personnel to utilize carpools. Further, a large number of our employees are under cover and, as such, are prohibited from using public transportation or mixed carpools to known CIA facilities. In effect, the parking fee for most of these personnel becomes a punitive action because of circumstances beyond their control. While we endorse parking fees where applicable in densely populated urban areas served by suitable public transportation, exception should be established for lightly populated suburban areas and in particular to those facilities of this Agency where significant numbers of employees fall within the situations described above.

I would add that this Agency must take exception with the statement that an agency can administer the collection

and management of the fee structure within current manpower ceilings. In today's tight budgetary ceilings, the additional work can only be absorbed by reducing other essential activity. Because of security and cover considerations, this Agency will be forced to operate the administration internally. Attempting to maintain a cleared commercial parking management team is not a practical alternative.

We appreciate very much this opportunity to make our views known and would hope that our comments be taken in a constructive manner and given due consideration and that appropriate exceptions and/or flexibility be given this Agency in the establishment and administration of parking fees.

Sincerely,

Clifford D. May, Jr.
Associate Deputy Director
for
Administration